

**Federal Defenders
OF NEW YORK, INC.**

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April 28, 2022

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York NY 10007

**Re: United States v. Andrew Lawrence
21 Cr. 127 (PGG)**

Dear Judge Gardephe,

I write to respectfully request (1) a modification to Mr. Lawrence's bail conditions and (2) that the Court adjourn the sentencing in the above-captioned case. I have spoken to the Government by Assistant United States Andrew Jones and he consents to both requests.

At the time of his plea, the Court encouraged Mr. Lawrence to obtain employment. He has worked hard to do so, and recently arranged to become an informal home health aide to his mother-in-law, Marly Arce. Ms. Arce [REDACTED] that makes basic "activit[ies] of daily living," like "cooking, cleaning, and shopping" difficult for her. See Exhibit A, Letter from Ms. Arce's Doctor. Ms. Arce and Mr. Lawrence also agreed on a 5-day-per-week schedule.

When we sought approval for this schedule from Pretrial Services, Officer Lettieri recommended that Mr. Lawrence's bail conditions be changed to include a curfew to be set by Pretrial Services, rather than home detention. Officer Lettieri made this recommendation to accommodate Mr. Lawrence's new schedule and because he reports that Mr. Lawrence has been doing really well on supervision.

Given these developments, we also ask that the Court adjourn sentencing, which is currently scheduled for May 24, 2022, for approximately 45 days. This is the second request for an adjournment of his sentencing. We think that Mr. Lawrence's transition to this new job and these new bail conditions will be relevant to the Court's evaluation of the Section 3553(a) factors at sentencing. Thus, we ask for this additional time, which will serve as an opportunity for him to demonstrate his compliance with new conditions and a new job.

Thank you for your consideration.

Respectfully submitted,
/s/
Sylvie Levine
212-417-8729

EXHIBIT A



To: Whom It May Concern
From: P Tenore, MD
Re: Arce, Marly
Date: 4/19/2022

Greetings:

Please note that Ms Arce. Needs in home assistance with activity of daily living [REDACTED]

[REDACTED]
She needs assistance in home help with cooking, cleaning, shopping, etc.

Please contact me if you need further information.

Peter L. Tenore, MD, FASAM
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Medical Director, Wellness Center Waters Place,
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